

**AFFIDAVIT OF KRIS JONES**

**STATE OF MISSISSIPPI  
COUNTY OF HINDS**

PERSONALLY CAME and appeared before me, the undersigned authority in and for said county and state, within my jurisdiction, the within named KRIS JONES, who, having been duly sworn by me, states on oath the following:

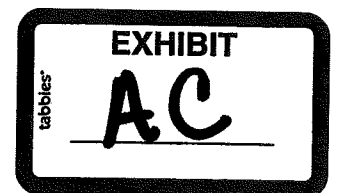
1. My name is Kris Jones.
2. I am over the age of 21.
3. I am competent to address the matters set forth below in this Affidavit.

4. The matters set forth in this Affidavit are based on my personal knowledge and the business records of the Mississippi Department of Child Protection Services (“MDCPS” or “Agency”) and its predecessor the Mississippi Department of Human Services Division of Family and Children’s Services (“DFCS”) and are true and correct to the best of my knowledge, information and belief.

5. I am familiar with the Stipulated Third Remedial Order (“STRO”) which was entered in December 2016 in the *Olivia Y* litigation. I am also familiar with the 2nd Modified Settlement Agreement (“2nd MSA”) which was entered as a consent order in the *Olivia Y* litigation in December 2016 and which became effective on January 1, 2018.

6. I am the Deputy Commissioner of Administration for the Mississippi Department of Child Protection Services. I have served in this position since September 2018. A true and correct copy of my current resume is attached to this Affidavit as Exhibit “A”.

7. In my role as Deputy Commissioner of Administration, I have primary responsibility over the following areas within MDCPS: human resources, finance, contracting,



procurement, subgrants, professional development, centralized intake, and information technology.

8. Before being selected and promoted to serve as the MDCPS Deputy Commissioner for Administration, I served as Director of Human Resources for MDCPS.

9. I am a certified public manager and a graduate of the John C. Stennis Institute of Government. I have a Bachelor of Science in Education and a Master of Social Work.

10. I have worked in state government for more than 20 years, most of that time with the Mississippi Department of Mental Health (“MDMH”). At MDMH, I held a variety of positions, including Director of the Bureau of Contract Management; Director of the Bureau of Quality Management, Operations, and Standards; Interim Director of the Bureau of Intellectual and Developmental Disabilities; Director of the Division of Disaster Preparedness, and Coordinator of Community Support Programs within the Division of Children/Youth.

11. MDCPS has increased caseworker salaries and wages to improve caseloads in Mississippi. In addition, MDCPS has created and implemented a Hiring Priority Committee composed of senior MDCPS executives. The committee meets weekly to assess caseworker need and to make hiring and case assignment decisions.

12. I have also reviewed and summarized recent MDCPS’s achievements and improvements. These achievements and improvements include the following: (a) Consolidating all MDCPS management staff in a central location at 750 North State Street in Jackson, Mississippi; and (b) Bringing all new hire and staff training in house. Under the in-house training program, new MDCPS caseworkers receive a minimum of 270 hours of pre-service training and new MDCPS supervisors receive a minimum of 24 hours of pre-service training.

13. The 2nd MSA recognizes that the MACWIS database system reporting capacity was limited given the age and capabilities of the system. For this reason, the 2nd MSA included several requirements that would improve MDCPS's data reporting capacity over time. The first and foremost of these requirements was that MDCPS would eventually replace its MACWIS system with a new Comprehensive Child Welfare Information System ("CCWIS") by June 30, 2021.

14. CCWIS is partially funded with 50% federal financial participation rate for the development of modern child welfare data systems meeting certain specifications identified by the federal government. Every CCWIS project must be conducted pursuant to a federally approved advanced planning document ("APD"). The APD sets forth the project plan, system design, and anticipated costs.

15. MDCPS submitted the CCWIS APD on February 1, 2017. The federal government responded with several requests for additional information and, after receiving that information, approved MDCPS's CCWIS APD on July 7, 2017 for project work through June 30, 2018. Under this APD, MDCPS planned to build a completely custom-designed CCWIS system from the ground up – i.e., coded from scratch unless individual pre-existing component parts were found that could be integrated with the wholly custom portions of the system. This project plan required significant investment in programmers and other contract resources. This project was to proceed as an iterative process, wherein individual modules – e.g. intake or case management – were completed and rolled out in a tiered process that would proceed up until the 2021 deadline. This project was projected to cost more than \$60 million.

16. Once the APD had been submitted, MDCPS began building its capacity, and incurring costs for the project, including the addition of programmers and business systems

analysts to the MDCPS IT staff. Contract resources were procured for system design, project management, and programming. Procurement also proceeded for the vendors that would begin building the core CCWIS modules in 2018.

17. When MDCPS determined that it faced an approximately \$52 million deficit in early January 2018, full implementation of the CCWIS project was delayed and paused because funds were no longer available to cover the cost of the work. However, state staff were able to continue planning for the project's future in anticipation of additional funding to continue the project.

18. Because MDCPS received level funding for SFY-2019, CCWIS development work remained on hold. While development work remained on hold during SFY-2019, MDCPS reevaluated its project plan and direction and determined that the most reasonable project direction in terms of cost and risk, and most likely scenario for meeting the litigation deadline, would come from a customizable and configurable system – i.e., development will begin with an already developed and functional case management data system, possibly one specifically designed to meet CCWIS specifications, that is configured to match MDCPS's practice.

19. MDCPS's prior project direction increased cost, time, and risk. Under the new project plan, the CCWIS development is expected to cost approximately \$40 million, two-thirds the cost of the original plan.

20. In response to the SFY-2020 appropriation, MDCPS immediately began the work necessary to get the CCWIS project back on track. Specifically, MDCPS has submitted a draft request for proposal to Mississippi's Department of Information Technology Services for review, feedback, and approval. This RFP will procure the vendor and system that is the main component of the project.

21. MDCPS also has submitted a new APD to the federal government for review and approval. MDCPS expects to begin development by the beginning of 2020, and to meet the litigation deadline of June 30, 2021. When the CCWIS system is implemented, many of MDCPS's data reporting issues should be resolved.

22. In November 2018, MDCPS submitted its first annual CQI plan under the 2nd MSA to the Monitor for review. That plan was reviewed by Plaintiffs and the Monitor, subsequently approved by the Monitor, and is being implemented by MDCPS in 2019 as contemplated by Section 1.4 of the 2nd MSA.

23. Some of MDCPS's data reporting challenges and the Monitor's inability to validate certain reports, stemmed from errors in the coding used to set up MDCPS's 2nd MSA reporting. Because the staff who originally coded these reports are no longer employed by MDCPS, new data reporting staff has been added, including the former head of data reporting for another state agency in Mississippi.

24. The new staff, together with Deputy Commissioner Davenport, have been conducting an intensive analysis, which is ongoing, of the coding and business rules behind each *Olivia Y* report. Once their initial analysis was completed, initial findings were reported and a meeting was held between MDCPS and the Monitor to discuss the business rules the Monitor will use to validate each report. In follow up to that meeting, the MDCPS data reporting team has begun the long work of rewriting each report to ensure that the data generated matches the relevant 2nd MSA deliverable and the Monitor's business rules for data validation. This process is expected to last until the end of 2019. Once the process is completed, all data validation issues identified by the Monitor should be rectified.

FURTHER AFFIANT SAYETH NOT, this the 3<sup>rd</sup> day of Sept., 2019.

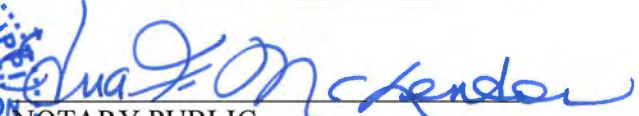
  
KRIS JONES

SWORN TO AND SUBSCRIBED BEFORE ME, this the 3<sup>rd</sup> of September, 2019.

My Commission Expires:

5/22/2022



  
NOTARY PUBLIC